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Consultation on the Draft Scottish Climate Change Adaptation Programme: Analysis of Responses

Environment



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**CONSULTATION ON THE DRAFT SCOTTISH
CLIMATE CHANGE ADAPATION PROGRAMME:
ANALYSIS OF RESPONSES**

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	i
1 INTRODUCTION AND BACKGROUND	1
Background	1
The consultation process	1
Methods	2
2 RESPONSE TO THE CONSULTATION	3
Number of responses received and types of respondents	3
Geographical distribution of respondents	3
Responses to individual questions	3
3 KEY ISSUES FROM THE CONSULTATION	5
General perceptions	5
Need for clarity about delivery mechanisms	5
The role of local authorities	5
Links between themes	6
Clarify the links to other (external) policy areas and with adaptation	6
4 VIEWS ON THE OVERARCHING FRAMEWORK	7
Appropriateness of the overarching framework	7
Extent to which the overarching framework addresses the impacts in the UK CCRA	8
5 CLIMATE READY NATURAL ENVIRONMENT	10
Do the objectives collectively set an appropriate long term direction (Q2a)	10
Appropriateness of policies and proposals under each objective (Qs 2b-2d)	12
Extent to which the Programme addresses the risks identified in the UK CCRA (Q2e)	16
6 CLIMATE READY BUILDINGS AND INFRASTRUCTURE NETWORKS	18
Do the objectives set an appropriate long term direction? (Q3a)	18
Appropriateness of policies and proposals under each objective (Qs 3b-3d)	20
7 CLIMATE READY SOCIETY	26
Do the objectives collectively set an appropriate long term direction? (Q4a)	26
Extent to which the Programme addresses the risks identified in the UK CCRA (Q4e)	32
8 ROLE OF OTHERS IN DELIVERING THE PROGRAMME	34
Support required by public bodies to help deliver the Programme (Q5a)	34
Arrangements for public engagement (Q5b)	36
9 STRATEGIC ENVIRONMENTAL ASSESSMENT REPORT	38
Description of the current environmental baseline (Q6a)	38
Predicted environmental effects of the Programme (Q6b)	39
Recommendations in the Environmental Report (Q6c)	40
Proposals for monitoring the environmental effects of the Programme (Q6d)	41
Additional information to help inform the environmental assessment findings (Q6e)	42
Alternatives to the Programme (Q6f)	43
10 OTHER COMMENTS	44
Disagreeing with the premise of the consultation	45
Comments on the consultation process	45

ANNEX 1: LIST OF ORGANISATIONAL RESPONDENTS

46

ANNEX 2: QUESTION RESPONSE RATES

47

EXECUTIVE SUMMARY

Introduction

Section 56 of the Climate Change Act 2008 requires the UK Government to publish a Climate Change Risk Assessment (CCRA) every five years. Following these assessments, the Climate Change (Scotland) Act 2009 requires Scottish Ministers to lay before the Scottish Parliament a programme for adaptation to climate change setting out Scottish Ministers' adaptation objectives, and their policies and proposals to meet those objectives. The first UK CCRA was published in January 2012 and a draft Scottish Climate Change Adaptation Programme (the Programme) was developed in partnership with stakeholders, addressing the risks identified in the report for Scotland. This first Programme is part of an iterative process and subsequent Programmes are required to address the risks identified for Scotland in successive CCRAs.

The Programme is structured around an overarching aim to increase the resilience of Scotland's people, environment and economy to the impacts of a changing climate. It comprises three themes – (i) Climate Ready Natural Environment (the N theme); (ii) Climate Ready Buildings and Infrastructure Networks (the B theme); and (iii) Climate Ready Society (the S theme). Each theme has an outcome that the Programme is seeking to deliver in the long term (up to 2050). Within each theme there are three objectives, each with policies and proposals that provide a focus for the lifetime of the Programme in order to progress towards the long term objective. Altogether there are 124 policies and proposals included in the Programme.

Between June and September 2013, the Scottish Government undertook a public consultation to invite views on the Programme and the Strategic Environmental Assessment (SEA) which accompanied it.

The consultation questionnaire included a combination of closed and open questions. In the closed questions, respondents were asked to tick a box to indicate their level of support for particular aspects of the Programme. In the open questions, respondents were invited to provide further comments.

The consultation received 67 responses. All but three of these were from organisational respondents. Just over half of the organisational respondents were public bodies with defined duties under the Climate Change (Scotland) Act 2009.¹ A summary of the main findings from the consultation responses follows.

Key issues from the consultation

There was broad support for the Programme's overarching framework, and its objectives, policies and proposals. Respondents also generally thought that the Programme and its objectives, policies and proposals addressed the impacts to Scotland identified in the UK CCRA.

¹ Section 44 of the Climate Change (Scotland) Act 2009 requires that a public body must, in exercising its functions, act: in the way best calculated to deliver any statutory adaptation programme; and in a way that it considers most sustainable.

Respondents welcomed the Programme and acknowledged the efforts of the Scottish Government in creating a “comprehensive”, “balanced” and “flexible” framework to focus the work of adaptation. However, at the same time, it was common for respondents to request more detail about certain aspects of the Programme and to suggest that there should be a greater emphasis on “taking action”.

Across all questions, respondents repeatedly raised a number of key issues as areas for improvement in the Programme. In particular, there were requests for clarification about how it would be delivered, who was responsible / accountable for delivery, priorities and timescales, funding, and arrangements for reporting and monitoring. Local authorities, in particular, thought that their role in the delivery of the Programme was missing or understated. This was thought to be a significant omission because of the considerable influence that local authorities have at a local level over a wide range of issues.

Other key issues repeatedly raised by respondents in their comments included the need to highlight areas where there were links between the Programme’s three main themes. One such area was in relation to green space and green infrastructure, which was perceived to have benefits for the natural environment, built environment and society.

Respondents also thought it was important for the Programme to clarify the relevance to adaptation of certain policies listed under the three themes.

Views on the overarching framework

The majority of respondents thought that the overarching framework for the Programme set an appropriate long term direction for climate change adaptation in Scotland, and that it addressed the impacts to Scotland identified in the UK CCRA.²

Those who thought the Programme was generally appropriate described it as “comprehensive”, “balanced” and “flexible enough to cover a wide range of eventualities” as additional risks are identified over time. The thematic approach set out in the Programme was seen to be preferable to the sectoral approach previously used, and the “shift from being responsive to being anticipatory and pre-emptive” was also welcomed.

Those who thought the framework was less well equipped to meet the Programme’s objectives commented that the Programme appeared in some cases to be more “reactive than proactive”. This group wanted the Programme to communicate a greater sense of urgency.

Respondents made a range of suggestions about how the overarching framework could be improved. In particular, respondents thought that the risks of climate change to the Scottish economy were not sufficiently addressed, and that information should be included which explained how the private sector would be influenced to act in relation to adaptation.

² Here, and elsewhere in this Summary, “the majority of respondents” refers to the majority of those who responded to the closed questions regarding these aspects of the Programme.

Respondents pointed out that the UK CCRA does not cover all climate change risks for Scotland, and it was suggested that the Programme would be limited if it only focused on the risks and threats set out in the UK CCRA.

Climate Ready Natural Environment – the N theme

The three objectives in the N theme were:

- N1 – Understand the effects resulting from climate change and their impacts on the natural environment
- N2 – Support a healthy and diverse natural environment with the capacity to adapt
- N3 – Sustain and enhance the benefits, goods and services that the natural environment provides

A majority of respondents thought the three N objectives and the policies and proposals listed under them set an appropriate long term direction for natural environment adaptation – describing them as “suitable”, “sensible” and “logical”.

At the same time, respondents wanted to see a greater emphasis in the N objectives on taking action. They also highlighted the need for a holistic approach to adaptation of the natural environment. Respondents thought the natural environment can play a crucial role in helping Scotland’s infrastructure and society to adapt to climate change impacts. Therefore, if action is taken to help the natural environment adapt, this will add value to other adaptation efforts.

The policies and proposals under the N objectives were generally described as “appropriate” and “comprehensive”. Respondents thought the N theme could be strengthened by focusing more on positive measures such as restoring and sustaining ecosystems and local habitat networks, and not just on understanding the risks or avoiding the impacts of climate change.

Areas for development under the three N objectives included:

- **Objective N1:** the need for policies that cover a full range of habitats; a need for research into the effects of climate change on coasts and peatlands, and on the use of green space; and a concern that “citizen science” activities (although valuable), should not be seen as a substitute for professional monitoring.
- **Objective N2:** a need for a greater emphasis on the role of green infrastructure in supporting a healthy and diverse natural environment; and a need for more policies and / or proposals related to habitat creation and protection.
- **Objective N3:** a need to emphasise the importance of an ecosystems approach to guide adaptation for the natural environment.

Climate Ready Buildings and Infrastructure Networks – the B theme

The three objectives in the B theme were:

- B1 – Understand the effects of climate change and their impacts on buildings and infrastructure networks
- B2 – Provide the knowledge, skills and tools to manage climate change impacts on buildings and infrastructure
- B3 – Increase the resilience of buildings and infrastructure networks to sustain and enhance the benefits and services provided

A majority of respondents thought the three B objectives and their policies and proposals set an appropriate long term direction for adaptation of Scotland’s buildings and infrastructure networks. The B theme was described as “the most coherent of the three themes” in the Programme, and was seen to provide “a strong foundation” for improving the resilience of Scotland’s infrastructure.

Those who were less satisfied with the objectives thought they were “too narrowly defined” and wanted to see more specific objectives, incorporating a wider range of measures, with both short and long term actions. Respondents perceived gaps in the B theme in relation to: information and communications technology infrastructure; energy infrastructure; coastal and inland water infrastructure; and water supplies.

Respondents thought that the definition of “infrastructure” in the B theme should be broadened to include green infrastructure. They also emphasised the importance of avoiding unintended consequences from actions taken to address the B objectives – for example, action taken to improve the resilience of the road infrastructure could result in greater carbon emissions.

Areas for development under the three B objectives included:

- **Objective B1:** the need to incorporate policies aimed at supporting walking and cycling and reducing reliance on cars; the need to improve the resilience of a wide range of existing buildings, including housing, workplaces, care homes – as well as historic buildings, monuments and sites; and the need to include a wider range of policies and proposals to support a resilient energy sector.
- **Objective B2:** the need for a greater emphasis on providing training and tools to a wide range of professionals in the public and private sectors.
- **Objective B3:** the need to address the challenges of developing resilience in older buildings; and the availability of flood insurance for small businesses as well as householders.

Climate Ready Society – the S theme

The three objectives in the S theme were:

- S1 – Understand the effects of climate change and their impacts on people, homes and communities
- S2 – Increase the awareness of the impacts of climate change to enable people to adapt to future extreme weather events
- S3 – Support our health service and emergency responders to enable them to respond effectively to the increased pressures associated with a changing climate

A majority of respondents thought the three S objectives and their policies and proposals set an appropriate long term direction for adaptation of Scottish society – describing them as “comprehensive” and addressing “a good range of important issues”. Respondents considered the “climate justice work” identified under objective S1 to be especially welcome and valuable.

Those who were less satisfied commented that the S theme was “the least developed” of the Programme’s three themes. This group perceived gaps in relation to the adaptation of businesses and the economy and of food security. They also wanted to see a greater emphasis on building capacity in communities.

Areas for development under the three S objectives included (among others):

- **Objective S1:** the need to include a wider range of measures under S1; respondents suggested additional areas for research to better understand the effect of climate change on communities, and how communities can become more resilient.
- **Objective S2:** the need for resources to support capacity building in communities; and the need to consider the wider effects of climate change (i.e. other than flooding) on communities.
- **Objective S3:** the need to broaden the policies and proposals to reflect the contributions of other agencies (not just health and emergency services) to the increased pressures associated with a changing climate.

Role of others in delivering the Programme

In terms of the support required by public bodies with duties to help deliver the Programme, respondents highlighted a need for guidance, tools and training; leadership at a senior level in national and local government; financial models to support investment in adaptation activities; and strengthened planning policy. Support was voiced for organisations like Adaptation Scotland and the Sustainable Scotland Network which play an important role in capacity building, sharing knowledge and producing guidance for public bodies.

Respondents were divided in their views about whether the Programme set out adequate arrangements for public engagement and for involving a range of other stakeholders in delivery. Respondents wanted to see the Programme include a “clear statement of ambition” to engage more inclusively with all relevant stakeholders, including businesses, communities, the media and the general public. There was also

a request for clarification about who would be responsible for the delivery of engagement activities, and the timescales and resources available for this work.

Strategic Environmental Assessment (SEA)

In relation to the SEA, a majority of respondents thought the SEA set out an accurate description of the current environmental baseline; and agreed with the predicted environmental effects, the recommendations and the proposals for monitoring the environmental effects of the Programme. They were also not aware of additional environmental information that would help inform the environmental assessment findings, nor were they aware of other 'reasonable' alternatives to the Programme and its content that should be considered as part of the SEA process.

Conclusion

In general, respondents supported the Scottish Government's draft Scottish Climate Change Adaptation Programme and voiced their willingness to play a part in helping Scotland to become more resilient to the processes of climate change. Some respondents made positive comments about the Programme overall, describing it as "comprehensive" and "welcome", and recognising the effort taken by the Scottish Government in developing a strategic approach to adaptation. At the same time, they wanted to see the Programme communicate a greater sense of urgency and put a greater emphasis on action.

Respondents emphasised the importance of adaptation becoming embedded in the policy, processes and language of the planning system. They also thought that partnership working is key to the success of the Programme.

1 INTRODUCTION AND BACKGROUND

- 1.1 This report presents findings from a public consultation on the draft Scottish Climate Change Adaptation Programme (hereafter referred to as “the Programme”).

Background

- 1.2 Section 56 of the Climate Change Act 2008 requires the UK Government to publish five-yearly assessments of risk to the UK. The first UK Climate Change Risk Assessment (CCRA) was published in January 2012 and included a Climate Change Risk Assessment for Scotland.
- 1.3 Following these assessments, the Climate Change (Scotland) Act 2009 places a statutory duty on Scottish Ministers to lay a programme before the Scottish Parliament, setting out their adaptation objectives and their policies and proposals to meet those objectives.
- 1.4 To date, the Scottish Government’s efforts in relation to adaptation have been guided by Scotland’s Climate Change Adaptation Framework, published in 2009. Following the publication of the UK CCRA, a draft Scottish Climate Change Adaptation Programme has been developed in partnership with stakeholders, using the CCRA as the basis, and taking into account the progress made in Scotland over the past few years through the Framework. The Framework will be replaced by the statutory Adaptation Programme when published in final form.
- 1.5 As required by legislation, the Programme sets out the Scottish Government’s objectives, policies and proposals for increasing Scotland’s resilience in managing the serious impacts of a changing climate. The Programme is structured around an overarching aim and three themes – (i) Climate Ready Natural Environment (N theme); (ii) Climate Ready Buildings and Infrastructure Networks (B theme); and (iii) Climate Ready Society (S theme). Each of the themes has an outcome that the Programme is seeking to deliver in the long term (up to 2050), and within each theme there are three objectives, each with policies and proposals that provide the focus for the lifetime of the Programme in order to progress towards the long term objective. Altogether there are 124 policies and proposals included in the Programme.

The consultation process

- 1.6 Around 600 individuals / organisations were invited to take part in the consultation. The consultation ran for three months from 28th June to 27th September 2013. The public consultation was open for anyone to comment, including stakeholders, and public bodies in Scotland who will have a statutory duty to help deliver the Programme when published.
- 1.7 The consultation invited views on the Scottish Government’s draft Programme, as required by section 53 of the Climate Change (Scotland) Act 2009. It also sought views on the Strategic Environmental Assessment (SEA), which identifies the environmental considerations that have informed the development of the Programme.

Methods

- 1.8 The consultation questionnaire included a combination of closed questions, where respondents were asked to tick a box, and open questions, where respondents were invited to provide further comments. The closed questions largely took a similar form where respondents were asked to indicate their level of support for a particular issue. For example, Question 1a asked: “To what extent does the overarching framework of the Programme set an appropriate long term direction for climate change adaptation in Scotland?” Respondents were then asked to indicate their level of support by ticking either “Fully”, “Mostly”, “Partially” or “Poorly”.
- 1.9 If respondents did **not** tick the box for a particular question, but then went on to provide comments on the question, no attempt was made to impute their response to the closed question on the basis of their comments. This is because the comments made by respondents who ticked “Fully” or “Mostly” were often very similar to those made by respondents who ticked “Partially” or “Poorly”.
- 1.10 Following data entry, quantitative and qualitative analysis were carried out on the responses on a question-by-question basis.
- 1.11 Quantitative analysis aimed to determine the number and types of respondents who answered each question. Given the relatively small numbers of respondents to each question in the consultation, it is not possible to identify any clear differences in views between different types of respondents. Rather, respondents from different sectors often made the same or similar points. In addition, as noted above, the similar points were often made irrespective of whether respondents had expressed satisfaction or dissatisfaction with certain aspects of the Programme (in their responses to the tick-box questions).
- 1.12 Thus, the findings of the quantitative analysis should be treated with caution. The main value of the analysis is in relation to the qualitative findings which identify key issues for development within the Programme.
- 1.13 The aims of the qualitative analysis were to identify the range of issues raised by respondents in their comments. However, this consultation received responses from a relatively small number of experts in the field. Individual responses often raised significant and detailed points which were not made by any other respondent. Thus, it has not been possible to adequately reflect in this report the full range of issues raised in the responses. However, each response will be read by the Scottish Government to inform any revisions to the Programme.
- 1.14 This report has sought to summarise the **key** issues identified in the consultation. The key issues were those raised by **a range of respondents**, and where there was largely **agreement** among respondents about how the Programme should be developed.

2 RESPONSE TO THE CONSULTATION

2.1 This section provides details of the number and types of respondents to the consultation and the types of responses received.

Number of responses received and types of respondents

2.2 The consultation received 67 responses. All but three of these were from organisational respondents. (Table 2.1)

Table 2.1: Number of responses received

Respondent type	n	%
Individuals	3	4%
Groups / organisations	64	96%
Total	67	100%

2.3 Local authorities comprised a third of organisational respondents (34%), while non-government organisations comprised a fifth (19%). Other respondents included NHS boards and other health-related bodies; and agencies involved in conservation and planning, education and research, transport and the private sector. (Table 2.2). Just over half of the organisational respondents were public bodies with defined duties under the Climate Change (Scotland) Act 2009.³ A complete list of organisational respondents is provided at Annex 1.

Table 2.2: Group / organisational respondent types

Group / organisational respondent type	n	%
Local authorities & community planning partnerships	22	34%
Non-government organisations	12	19%
Education and research bodies	7	11%
NHS or health-related agencies	5	8%
Conservation and planning bodies	4	6%
Transport agencies	4	6%
Private sector organisations	4	6%
Other public bodies	6	9%
Total	64	100%

Note: Percentages do not total 100% due to rounding.

Geographical distribution of respondents

2.4 The majority of respondents were based in Scotland and had a Scotland-wide remit. Four respondents were based in England. Two of these were education / research organisations and two were private sector energy companies.

Responses to individual questions

2.5 Not all respondents answered all the questions in the consultation. Response rates for the closed (tick-box) questions ranged from 55-88% for questions 1-5

³ Section 44 of the Climate Change (Scotland) Act 2009 requires that a public body must, in exercising its functions, act: in the way best calculated to deliver any statutory adaptation programme; and in a way that it considers most sustainable.

of the consultation questionnaire. Response rates for the open questions were generally lower, ranging from 39-85% in questions 1-5. Response rates generally declined towards the end of the questionnaire, with the response rates highest for question 1 and lowest for question 5. The response rates for the Environmental Report questions (questions 6a-f) were lower still, ranging from 37-43% for closed questions and 13-31% for open questions. Annex 2 provides details of the number of responses received against each question.

3 KEY ISSUES FROM THE CONSULTATION

3.1 This section summarises a number of key issues that were repeatedly raised by respondents across all questions in the consultation. The key issues were identified by respondents as areas for improvement in the Programme. These issues are discussed here, and are not repeated in Chapters 4, 5, 6 and 7.

General perceptions

3.2 Respondents generally welcomed the Programme and acknowledged the efforts of the Scottish Government in creating a “comprehensive” and “coherent” framework to focus the work of adaptation. However, it was also common for respondents to describe particular aspects of the Programme as “vague”.

3.3 Respondents also thought that the focus on existing policies gave the impression that “there is not much new” in the Programme and that it did not add value to what was already happening. Respondents wanted to see a greater sense of urgency in the Programme and called for increased emphasis on “taking action” to balance the perceived over-emphasis in the Programme on improving knowledge and understanding.

Need for clarity about delivery mechanisms

3.4 Respondents repeatedly made the point that there is little information in the Programme about:

- How it will be delivered
- Who is responsible / accountable for delivery
- What the priorities and timescales will be
- What monitoring and reporting arrangements will be put in place
- What resources will be available

3.5 These issues were of particular concern to local authorities, NHS organisations and other organisations that have public body duties under Section 44 of the Climate Change (Scotland) Act 2009, but they were raised more generally by other respondents across all sectors too.

3.6 Respondents were not clear for whom the Programme was written. While it was recognised that the Scottish Government had a legal obligation to produce the Programme, they were not certain what action was required from stakeholders in response to it, and whether there would be any reporting requirements. Local authorities, in particular, wanted guidance about the implications for Single Outcome Agreements. Moreover, local authorities and NHS respondents were concerned that without more detail in the Programme, it would be difficult to secure support for investment from within their own organisations. There were also concerns about the lack of policies or proposals aimed at developing skills and capacity within public sector bodies.

3.7 These issues will be discussed in further detail in Chapter 8 of this report.

The role of local authorities

3.8 Local authorities generally thought that their role in the Programme was missing or understated. This was considered to be a significant omission, given the very wide range of issues at a local level that local authorities can influence.

Links between themes

3.9 Respondents commented that the Programme should adopt a holistic approach, and therefore it was important to make explicit the links that exist between the Programme's three themes in relation to issues such as:

- Green infrastructure, including urban drainage, shading of buildings and areas of natural flood management
- Integrated catchment management, including planning, flooding and water quality
- "Working with nature" – the role that the natural environment can play in supporting adaptation
- Improving community resilience through improved building standards and resilient energy, IT, water and transport infrastructures

3.10 Respondents' comments on these issues will be discussed in further detail in Chapters 4-6.

Clarify the links to other (external) policy areas and with adaptation

3.11 Respondents suggested that the Programme should also make links with other (external) policy areas. The two areas mentioned by a range of respondents were in relation to community empowerment and mitigation.

3.12 There were differing views about how the links to mitigation should be demonstrated in the Programme. Some respondents thought the Programme should highlight its links with the mitigation agenda – drawing out how certain policies were appropriate for both an adaptation framework and a mitigation framework. Others pointed out that some policies appeared to be more related to mitigation than adaptation, and these policies should either be removed or the link to adaptation made more explicit. Examples included, among others, the policies on:

- Farming for a Better Climate Programme (N3-21)
- Water Use Efficiency (B2-3)
- Energy efficiency (B2-6, B3-7, S2-3)
- Extend the requirement for sustainability labelling beyond schools to other non-domestic buildings (B2-23)
- Eradicate fuel poverty (S2-1)

3.13 This latter point was expressed in a more general way by other respondents, who thought that the Programme should clarify the relevance of certain policies to adaptation. Examples included, among others, the policies on:

- Land Use Strategy (N2-8)
- Scottish Biodiversity Strategy (N2-9)
- Marine planning (N2-13 and N2-14; B2-9, B2-10)
- Common Agricultural Policy (N3-1)
- Fishing and aquaculture (N3-14 and N3-15)
- Developing a greater understanding of food-borne disease related pathogens (S1-1)

4 VIEWS ON THE OVERARCHING FRAMEWORK

4.1 This chapter presents an analysis of respondents' views on the overarching framework for the Programme. The consultation included two questions about the framework:

Question 1a: To what extent does the overarching framework of the Programme set an appropriate long term direction for climate change adaptation in Scotland?

Question 1b: Does the overarching framework address the current and predicted impacts to Scotland identified in the UK Climate Change Risk Assessment?

Appropriateness of the overarching framework

4.2 Fifty-four (54) respondents answered Question 1a. Of these, 43 (80%) thought that the overarching framework either “fully” or “mostly” set an appropriate long term direction for climate change adaptation in Scotland, while 11 (21%) thought it only “partially” or “poorly” did so. (Table 4.1.) The latter group included four of the 10 non-governmental organisations (NGOs).

Table 4.1: Question 1a – To what extent does the overarching framework of the Programme set an appropriate long term direction for climate change adaptation in Scotland?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research	1	2	2		5
Local authority & CPPs	1	17	2	1	21
NGOs	1	5	4		10
NHS or health-related		4			4
Other public bodies		5			5
Private sector	2	1	1		4
Transport	1	2			3
Individual respondents		1			1
Total	6	37	10	1	54
Total percentages	11%	69%	19%	2%	100%

* Percentages do not total 100% due to rounding.

4.3 Fifty-seven (57) respondents (81% of all respondents) provided comments in relation to Question 1a.⁴ Those who thought the programme was generally appropriate described it as “comprehensive”, “balanced” and “flexible enough to cover a wide range of eventualities” as additional risks are identified over time. The thematic approach set out in the Programme was seen to be preferable to the sectoral approach previously used, and the “shift from being responsive to being anticipatory and pre-emptive” was also welcomed.

Those who thought the framework was less well equipped to meet the Programme’s objectives described certain objectives (and policies) in the Programme as “vague” and asked for details about priorities and timescales. This group commented that the Programme appeared in some cases to be more

⁴ Across all questions, some respondents made comments, but did not tick a box in the closed question. Thus for some questions (including Question 1a), there were more comments to the open questions than responses to the tick box questions.

“reactive than proactive”, and to be “applying remedial approaches to current practices”, rather than adopting a long term, principled approach required for adaptation. These respondents also wanted the Programme to communicate a greater sense of urgency and a call for action.

Specific suggested improvements

4.4 There were a range of suggestions about how the framework could be improved. Most of these concerned requests for clarification in relation to: the responsibility for delivery of the Programme; the role of local authorities in particular; the links between themes; and the arrangements for monitoring. All of these issues have been discussed in Chapter 3 and so will not be repeated here.

4.5 Additional points raised by a range of respondents included:

- Economic impacts: Respondents commented that the Programme did not sufficiently address the potential impacts of climate change on businesses and services.
- The role of the private sector: Respondents thought that in order for the Programme to set an appropriate long term direction, it should indicate how the private sector would be influenced to act in relation to adaptation. This was perceived to be a gap.

Extent to which the overarching framework addresses the impacts in the UK CCRA

4.6 Forty-nine (49) respondents answered Question 1b. Of these, 34 (69%) thought that the overarching framework either “fully” or “mostly” addressed the impacts to Scotland identified in the UK CCRA, while 15 (31%) thought they only “partially” or “poorly” did so. (Table 4.2.) A substantial proportion of the local authority respondents (8 out of 21) thought the framework only “partially” addressed the current and predicted impacts set out in the UK CCRA.

Table 4.2: Question 1b – Does the overarching framework address the current and predicted impacts to Scotland identified in the UK Climate Change Risk Assessment?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research	1	1	1	1	4
Local authority & CPPs	1	12	8		21
NGOs		5	2		7
NHS or health-related		3	1		4
Other public bodies	1	4			5
Private sector	2	1	1		4
Transport	1	1			2
Individual respondents		1			1
Total	6	28	14	1	49
Total percentages	12%	57%	29%	2%	100%

4.7 Forty-three (43) respondents (64% of all respondents) made comments in relation to Question 1b. The most common point made by respondents was that it would be helpful for the Programme to clarify which aspects of the UK CCRA fell under each of the three themes in the Programme.

- 4.8 Respondents also noted that the UK CCRA does not cover all climate change risks for Scotland. For example, it does not include risks to all of Scotland's species. In addition, the risks to Scottish society were poorly specified in the UK CCRA because of a lack of data. Therefore, it was suggested that the Programme would be limited if it only focused on the risks and threats set out in the UK CCRA.
- 4.9 The point was also made that some risks appeared to be more comprehensively covered than others, but that the Programme had provided no explanation of why this was the case.
- 4.10 Respondents identified additional risks which they thought were not adequately addressed in the Programme. Many of these issues were also raised in comments made on each of the Programme's three themes, and so they are not discussed in detail here. Additional areas at risk identified by a range of respondents included:
- Energy supply
 - Peatland degradation
 - Coastal erosion and flooding
 - Overheating and drought
 - Economy (as noted in paragraph 4.5 above)

5 CLIMATE READY NATURAL ENVIRONMENT

5.1 This chapter presents an analysis of respondents' views on the objectives, policies and proposals set out under the heading of a Climate Ready Natural Environment (the N theme). The N theme included three objectives:

- N1 – Understand the effects resulting from climate change and their impacts on the natural environment
- N2 – Support a healthy and diverse natural environment with the capacity to adapt
- N3 – Sustain and enhance the benefits, goods and services that the natural environment provides

5.2 The consultation asked five questions in relation to this theme:

Question 2a: Do objectives N1, N2 and N3 collectively set an appropriate long term direction to ensure that Scotland's natural environment is able to adapt to our changing climate?

Question 2b: To what extent will the policies and proposals listed under objective N1 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 2c: To what extent will the policies and proposals listed under objective N2 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 2d: To what extent will the policies and proposals listed under objective N3 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 2e: Taken together, do the policies and proposals listed under objectives N1, N2 and N3 address the current and predicted impacts to the natural environment in Scotland identified in the UK Climate Change Risk Assessment?

5.3 This chapter includes three sub-sections: the first will discuss respondents' comments to Question 2a; the second will present views about the policies and proposals under each objective (Questions 2b-2d); and the third will consider responses to Question 2e.

Do the objectives collectively set an appropriate long term direction (Q2a)

5.4 Forty-four (44) respondents answered Question 2a. Of these, 29 (66%) thought the objectives either "fully" or "mostly" set an appropriate long term direction for natural environment adaptation, while 15 (35%) thought they only "partially" or "poorly" did so. (Table 5.1.) The latter group included most of the non-governmental organisations (NGOs), six out of 20 local authorities and half of the education / research respondents.

Table 5.1: Question 2a – Do objectives N1, N2 and N3 collectively set an appropriate long term direction to ensure that Scotland’s natural environment is able to adapt to our changing climate?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research	1	1	2		4
Local authority & CPPs	4	10	5	1	20
NGOs		1	5		6
NHS or health-related	1	3			4
Other public bodies		4	1		5
Private sector		2			2
Transport	1				1
Individual respondents		1		1	2
Total	7	22	13	2	44
Total percentages	16%	50%	30%	5%	100%

* Percentages do not total 100% due to rounding.

5.5 Forty-one (41) respondents (61% of all respondents) provided further comment at Question 2a. Those who ticked “partially” or “poorly” in response to Question 2a generally made longer and more detailed comments than those who ticked “fully” or “mostly”.

General comments

5.6 Those who endorsed the objectives described them as “suitable”, “sensible” and “logical”. The three objectives were seen to “provide a clear sense of direction” and the “multi-agency” approach taken in the N theme objectives was appreciated.

5.7 Those who were less supportive thought that the objectives failed to address some key issues entirely, or that they addressed them inadequately (as described below).

Perceived gaps and areas for development

5.8 The main issues, raised by a range of respondents, included:

- **Need for action:** Respondents expressed concern that the emphasis in the N objectives was more on “understanding impacts” and “raising awareness”, and less on taking action. It was thought to be important to understand not only the impacts, but what drives them and what would help prevent them. There was concern that objective N1, in particular, could “be a recipe for inaction”.
- **Need for integration and a holistic approach:** A range of respondents commented that they wanted to see better (or more explicit) integration between the N theme and the other two themes in the Programme. These respondents believed the natural environment can play a crucial role in helping Scotland’s infrastructure and society to adapt to climate change impacts. Therefore, if action is taken to help the natural environment adapt, this will add value to other adaptation efforts.

Appropriateness of policies and proposals under each objective (Qs 2b-2d)

5.9 Questions 2b, 2c and 2d asked for respondents' views on the policies and proposals set out under objectives N1, N2 and N3 respectively. Tables 5.2, 5.3 and 5.4 on the following page show that around three-fifths of the 67 respondents answered each of these three questions:

- Of the 44 respondents who answered Question 2b, 27 (61%) thought that the policies and proposals under objective N1 either “fully” or “mostly” provided an appropriate lifetime focus for the Programme, while 17 (38%) thought they only “partially” or “poorly” did so.
- Of the 44 respondents who answered Question 2c, 32 (72%) thought that the policies and proposals under objective N2 were “fully” or “mostly” appropriate, while 12 (27%) thought they only “partially” or “poorly” did so.
- Of the 38 respondents who answered Question 2d, 26 (69%) thought that the policies and proposals under objective B3 were “fully” or “mostly appropriate, while 12 (31%) thought they only “partially” or “poorly” did so.

5.10 Across all three objectives, those who were less supportive included a majority of the NGO respondents and between a quarter and a third of the local authority respondents.

5.11 The number of respondents who made further comments at Questions 2b, 2c and 2d are shown below:

- 41 respondents (61% of the total 67) commented at Question 2b
- 43 respondents (64% of the total 67) commented at Question 2c
- 29 respondents (43% of the total 67) commented at Question 2d

General comments

5.12 Across all three objectives, respondents who endorsed the policies and proposals described them as “appropriate” and “comprehensive”. The approach to understanding the potential impacts of climate change (in objective N1) was thought to provide a good foundation for future adaptation work. The policies and proposals under objective N2 were described as “holistic in their coverage” and well balanced between different aspects of the natural environment.

5.13 However, other respondents thought that some of the policies or proposals were “too vague”. Respondents wanted to know how certain policies would assist adaptation. (The implementation of the Land Use Strategy (N2-8) and implementation of the EU reform of the Common Agricultural Policy (N3-1) were two examples.)

5.14 It was also suggested that the N theme could be strengthened by focusing more on positive measures to help adaptation, for example, by restoring and sustaining ecosystems and local habitat networks, rather than simply on understanding the risks or avoiding the impacts of climate change.

Table 5.2: Question 2b – To what extent will the policies and proposals listed under objective N1 provide an appropriate focus for the lifetime of the Programme?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	3		4
Local authority & CPPs	1	12	5	1	19
NGOs		1	4		5
NHS or health-related		4			4
Other public bodies		4	1		5
Private sector		1	1		2
Transport		2			2
Individual respondents		1	1		2
Total	1	26	16	1	44
Total percentages	2%	59%	36%	2%	100%

* Percentages do not total 100% due to rounding.

Table 5.3: Question 2c – To what extent will the policies and proposals listed under objective N2 provide an appropriate focus for the lifetime of the Programme?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		2	2		4
Local authority & CPPs	1	14	5		20
NGOs		1	4		5
NHS or health-related		4			4
Other public bodies		4			4
Private sector		2			2
Transport		2			2
Individual respondents		2			2
Total	1	31	12	0	44
Total percentages	2%	70%	27%	0%	100%

* Percentages do not total 100% due to rounding.

Table 5.4: Question 2d – To what extent will the policies and proposals listed under objective N3 provide an appropriate focus for the lifetime of the Programme

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research		1	2		3
Local authority & CPPs	2	11	4	2	19
NGOs		1	3		4
NHS or health-related		4			4
Other public bodies		5			5
Private sector		1	1		2
Transport	1				1
Individual respondents					0
Total	3	23	10	2	38
Total percentages	8%	61%	26%	5%	100%

5.15 Respondents voiced support for the proposals listed under the three N objectives. Proposal N3-16 (Greater recognition of the role of integrated land management in tackling climate change), in particular, was welcomed by a range of respondents. Suggestions were made by different respondents about how the description of this proposal could be strengthened in the Programme:

- Make specific reference to the protection and restoration of peatlands given their importance in enhancing water quality and reducing flood risk.
- Require all new developments and regeneration schemes to make provision for allotments and growing spaces in proximity to housing.
- Provide further detail about the aims and expected outcomes of this proposal to distinguish it from the policy regarding the implementation of the Land Use Strategy (N2-8).
- Highlight the key role of farmers and land managers in delivering this work and make provision for building capacity within this group.

Perceived gaps and areas for development

5.16 Respondents identified a wide range of issues which they thought were missing from the Programme and which should be included. There were also suggestions for further development and requests for clarification in the Programme. Very detailed comments, including suggestions for changes to the wording of individual policies and proposals, were offered by different respondents. These comments cannot be adequately represented in this report but will be considered carefully by the Scottish Government in finalising the Programme.

5.17 The issues reported below were those that were identified by a range of different types of respondents.

5.18 Under **objective N1** (understand the effects resulting from climate change and their impacts on the natural environment):

- **Balance of policies:** Several respondents thought that the policies under N1 appeared to place too much emphasis on marine and forestry environments, and not enough on other habitats. It was suggested that certain policies had (or should have) wider application to other types of habitats and ecosystems than what is described in the Programme. Respondents also advocated a more “rounded ecosystem-based approach” to understanding the impacts of climate change on the natural environment.
- **Understanding the effects of climate change on coasts and peatlands:** Respondents thought the risks of coastal erosion and the risk to peatlands were inadequately addressed in the policies and proposals under N1 (and indeed across the Programme). This was seen as a serious omission.
- **Use of green space:** Respondents wanted the Programme to incorporate research into the use of green space in supporting adaptation.
- **Responsibility for delivery:** Respondents made a wide range of suggestions for additional organisations and agencies that they thought should be involved in delivering particular policies. For example, Local Biodiversity Partnerships were often mentioned as key partners in the delivery of objective N1.

- Citizen Science: There was a general view that initiatives such as the policy to encourage citizen science and voluntary environmental monitoring (N1-9), should be acknowledged and supported. However, there were also some concerns raised about the range and quality of data that could be collected by volunteers, and that citizen science should not be seen as “a substitute for professional monitoring”.
- Data issues: The issue of data quality was not only mentioned in relation to citizen science. It was emphasised that high-quality data was crucial to help in decision-making. For example, LiDAR (Light Detection And Ranging) was seen to be important for many aspects of data gathering along the coast and river corridors (in relation to N1-10), but funding constraints had prevented its widespread use.
- Other perceived gaps: Respondents identified further gaps in objective N1 in relation to freshwater ecosystems; drought and changing water demands; food security and organic farming; historic environment interests; and socio-economic consequences of climate change for businesses that use the natural environment.

5.19 Under **objective N2** (support a healthy and diverse natural environment with the capacity to adapt), the following issues were raised by a range of respondents:

- Green networks: Respondents welcomed the reference to green networks in policy N2-2, but wanted greater emphasis on the role of green infrastructure in supporting a healthy and diverse natural environment. (This could include street trees, green roofs, allotments, wetlands and water features, etc.).
- Non-native invasive species: Respondents welcomed the policies on managing invasive non-native species (N2-7 and N2-16). However, it was pointed out that both these policies were now superseded by the “2020 Challenge for Scotland’s Biodiversity”.
- Land use planning: In addition to N2-8 (implement the Land Use Strategy), it was suggested that the Programme should refer to Strategic and Local Development Plans and development master-planning as key mechanisms for embedding adaptation into land use planning.
- Designated sites: Respondents thought that the focus in policies N2-3 and N2-4 on Natural Nature Reserves and designated sites respectively, was unnecessarily restrictive, and that adaptation measures should be applied wherever they are needed. In terms of policy N2-15 on marine designated areas, it was suggested that Marine Protected Areas (MPA) should be included.
- Habitat creation and protection: Respondents wanted to see more policies and / or proposals for habitat creation and protection, although it was also noted that an aim of the Scottish Biodiversity Strategy is to “restore and extend natural habitats”. Some respondents suggested that the Scottish Government’s existing policy on peatland restoration should be included in the Programme.

5.20 Under **objective N3** (sustain and enhance the benefits, goods and services that the natural environment provides), the following issues were raised by a range of respondents:

- **Balance of policies:** A range of respondents commented that the policies under objective N3 were too narrowly focused on agriculture, forestry and fishing (described as “managed land”). Respondents wanted a more rounded approach to include urban green space, food growing, floodplains and upland moorland.
- **Ecosystem approach / role of ecological services:** Respondents emphasised that an ecosystem approach should be applied to guide adaptation for the natural environment. Respondents wanted to see policies that are aimed at protecting and restoring the natural environment so it is more resilient to climate change impacts and supports adaptation measures. Such measures could be linked to local authority planning and land-use policies (for example, by preventing development on floodplains; through infrastructure maintenance; and by using green space for carbon storage, heat reduction and water management).
- **Common Agricultural Policy (CAP):** Respondents commented that policy N3-1 (regarding implementation of the EU reform of the CAP) needed more development to identify which parts of the CAP would address the objective. It was suggested that this could draw out the measures which could promote organic farming, or improve resilience among farmers through co-operation on agri-environment schemes or water sharing arrangements.
- **Fishing and aquaculture:** A wide range of comments were made in relation to policies N3-11 to N3-15. There was a general view that policies for aquaculture should be separated from those for fishing, as these are different industries.

Extent to which the Programme addresses the risks identified in the UK CCRA (Q2e)

5.21 Forty-two (42) respondents answered Question 2e. Of these, 28 (66%) thought that the policies and proposals listed under the N theme either “fully” or “mostly” addressed the current and predicted future impacts to Scotland’s natural environment identified in the UK CCRA, while 14 (33%) thought they only “partially” or “poorly” did so. (Table 5.5). The latter group included most of the non-governmental organisations (NGOs) and education / research organisations, and five out of 19 local authority respondents.

Table 5.5: Question 2e – Taken together, do the policies and proposals listed under objectives N1, N2 and N3 address the current and predicted impacts to the natural environment in Scotland identified in the UK Climate Change Risk Assessment?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	3		4
Local authority & CPPs	1	13	4	1	19
NGOs		1	4		5
NHS or health-related		4			4
Other public bodies		5			5
Private sector		2			2
Transport		1			1
Individual respondents			1		1
Total	1	27	13	1	42
Total percentages	2%	64%	31%	2%	100%

* Percentages do not total 100% due to rounding.

5.22 Thirty-six (36) respondents (54% of all respondents) made comments in relation to Question 2e.

5.23 In general, respondents who commented at Question 2e referred back to, repeated or summarised comments they had made in response to one or more of Questions 2a-2d. Some identified additional gaps or areas for development in the N objectives, policies or proposals; however, only a few respondents explicitly linked their comments to the UK CCRA. Others appeared to use the space provided at Question 2e for more general comments or “any other comments” that they had not already mentioned in relation to Questions 2a-2d.

Perceived gaps or areas for development

5.24 In terms of perceived gaps between the Programme and the UK CCRA, respondents sometimes pointed out that there were certain issues that were not well covered in the CCRA, which they thought should nevertheless be included in the Programme. The three areas identified by a range of respondents were in relation to peatland conservation, coastal erosion and use of green infrastructure / green space.

5.25 Respondents identified a range of other risks to the natural environment which did not appear to them to be addressed in the Programme. Examples included:

- Risks to terrestrial systems other than forestry
- Biodiversity risks due to warmer rivers and lakes
- Changes in biodiversity reproductive habits
- Asynchrony between species breeding cycle and food supply
- Waterlogging
- Increase in prevalence of certain diseases
- Decline in marine water quality due to sewer outflows

5.26 However, it was not generally clear from the responses whether these were related to risks identified in the UK CCRA.

6 CLIMATE READY BUILDINGS AND INFRASTRUCTURE NETWORKS

6.1 This chapter presents an analysis of respondents' views on the objectives, policies and proposals set out under the heading of Climate Ready Buildings and Infrastructure Networks (the B theme). The B theme included the following three objectives:

- B1 – Understand the effects of climate change and their impacts on buildings and infrastructure networks
- B2 – Provide the knowledge, skills and tools to manage climate change impacts on buildings and infrastructure
- B3 – Increase the resilience of buildings and infrastructure networks to sustain and enhance the benefits and services provided

6.2 The consultation asked five questions in relation to this theme:

Question 3a: Do objectives B1, B2 and B3 collectively set an appropriate long term direction to ensure that Scotland's buildings and infrastructure networks are able to adapt to our changing climate?

Question 3b: To what extent will the policies and proposals listed under objective B1 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 3c: To what extent will the policies and proposals listed under objective B2 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 3d: To what extent will the policies and proposals listed under objective B3 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 3e: Taken together, do the policies and proposals listed under objectives B1, B2 and B3 address the current and predicted impacts to Scotland's buildings and infrastructure networks identified in the UK Climate Change Risk Assessment?

6.3 This chapter includes three sub-sections: the first will discuss respondents' comments on Question 3a; the second will present views about the policies and proposals under each objective (Questions 3b-3d); and the third will consider the responses to Question 3e.

Do the objectives set an appropriate long term direction? (Q3a)

6.4 Forty-three (43) respondents answered Question 3a. Of these 33 (77%) thought the objectives either "fully" or "mostly" set an appropriate long term direction for adaptation of Scotland's buildings and infrastructure networks, while 10 (24%) thought they only "partially" or "poorly" did so. (See Table 6.1.) The latter group included most of the non-governmental organisations (NGOs), two out of three education / research bodies, and four out of 19 local authority respondents.

6.5 Forty-one (41) respondents provided further comment in relation to Question 3a. This represents 61% of the total 67 respondents.

Table 6.1: Question 3a – Do objectives B1, B2 and B3 collectively set an appropriate long term direction to ensure that Scotland’s buildings and infrastructure networks are able to adapt to our changing climate?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	1	1	3
Local authority & CPPs	4	11	3	1	19
NGOs		1	3		4
NHS or health-related		4			4
Private sector	2	2			4
Transport	3				3
Other public bodies		4			4
Individual respondents		1			1
Total	9	24	8	2	43
Total percentages	21%	56%	19%	5%	100%

* Percentages do not total 100% due to rounding.

General comments

- 6.6 Respondents who ticked “fully” or “mostly” in response to Question 3a described the objectives as “comprehensive” and “appropriate”. This group considered the B theme to be “the most coherent of the three themes”, providing “a strong foundation” for improving the resilience of Scotland’s infrastructure, and reflecting “the considerable experience developed nationally of severe weather events”. This group also noted that a successful adaptation programme would make Scotland more attractive for investment.
- 6.7 Those who were less satisfied with the objectives (i.e. those who ticked “partially” or “poorly” in response to Question 4a) described the B objectives as “vague” and “too narrowly defined”. This group wanted to see more specific objectives, incorporating a wider range of measures, with both short and long term actions.
- 6.8 Many of the issues set out in Chapter 3 (Key issues) were raised in respondents’ comments on the B theme. In particular, respondents pointed out that significant investment would be needed to bring about the adaptation of buildings and infrastructure in Scotland and there were concerns that the Programme was too short term to make this happen.

Perceived gaps and areas for development

- 6.9 Respondents identified a number of areas where they felt the B theme needed further development. The main issues raised by a range of respondents at Question 3a, included:
- The key role of planning: Respondents emphasised the importance of planning policy and legislation in delivering well adapted buildings and infrastructure. It was suggested that the Programme should inform the revised Scottish Planning Policy to give both planners and developers a strong policy basis for taking account of adaptation in the future.
 - Green infrastructure: Respondents thought that “infrastructure” was too narrowly defined in the Programme. Respondents emphasised the importance of green infrastructure in supporting a wide range of other adaptation measures (e.g. Sustainable Urban Drainage Systems (SUDS); management of

surface water run-off; air quality improvements; cooling of buildings and outdoor spaces; providing places for walking and cycling; delivering biodiversity benefits).

- Adaptation of existing buildings: The B objectives should prioritise the retrofitting of existing properties and incorporate policies to address flooding impacts, and algal and fungal growth in existing buildings.
- Avoid unintended consequences: Respondents commented that care should be taken to ensure that actions to address the B objectives do not inadvertently result in increased health risk (e.g. by reducing indoor air quality), or in greater carbon emissions (e.g. by increasing the resilience of the roads infrastructure in preference to rail or public transport networks).

6.10 Respondents perceived a lack of attention in the B theme to:

- Information and communications technology infrastructure
- Energy infrastructure
- Coastal and inland water infrastructure (including ports, harbours, canals)
- Water supplies (including both private water supplies and water supplies for key Scottish industries)

Appropriateness of policies and proposals under each objective (Qs 3b-3d)

6.11 Questions 3b, 3c and 3d asked for respondents' views on the policies and proposals set out under objectives B1, B2 and B3 respectively. Tables 6.2, 6.3 and 6.4 on the following page show that just over three-fifths of the 67 respondents answered each of these three questions:

- Of the 41 respondents who answered Question 3b, 29 (71%) thought that the policies and proposals under objective B1 either “fully” or “mostly” provided an appropriate lifetime focus for the Programme, while 12 (29%) thought they only “partially” or “poorly” did so.
- Of the 42 respondents who answered Question 3c, 28 (67%) thought that the policies and proposals under objective B2 were “fully” or “mostly” appropriate, while 14 (33%) thought they were less so.
- Of the 41 respondents who answered Question 3d, 28 (69%) thought that the policies and proposals under objective B3 were “fully” or “mostly” appropriate, while 13 (31%) thought they were less so.

6.12 Across all three objectives, those who were less supportive included a majority of the NGO respondents and around a quarter of the local authority respondents.

6.13 The number of respondents who made further comments at Questions 3b, 3c and 3d are shown below:

- 39 respondents (58% of the total 67) commented at Question 3b
- 42 respondents (63% of the total 67) commented at Question 3c
- 41 respondents (61% of the total 67) commented at Question 3d

Table 6.2: Question 3b – To what extent will the policies and proposals listed under objective B1 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	1	1	3
Local authority & CPPs	2	11	5		18
NGOs		1	3		4
NHS or health-related	1	3			4
Private sector	2	2			4
Transport		3			3
Other public bodies		3	1		4
Individual respondents					0
Total	5	24	11	1	41
Total percentages	12%	59%	27%	2%	100%

Table 6.3: Question 3c – To what extent will the policies and proposals listed under objective B2 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	1	1	3
Local authority & CPPs	1	12	5		18
NGOs			4		4
NHS or health-related		2	2		4
Private sector	3	1			4
Transport		3			3
Other public bodies		4			4
Individual respondents		1			1
Total	4	24	13	1	42
Total percentages	10%	57%	31%	2%	100%

Table 6.4: Question 3d – To what extent will the policies and proposals listed under objective B3 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research	1			1	2
Local authority & CPPs	1	12	6		19
NGOs		1	3		4
NHS or health-related		3	1		4
Private sector	3	1			4
Transport	1	2			3
Other public bodies		3	1		4
Individual respondents					0
Total	6	22	12	1	41
Total percentages	15%	54%	29%	2%	100%

General comments

- 6.14 Those who supported the policies and proposals described them as “comprehensive”, “realistic” and “sound”. Respondents particularly welcomed the Scottish Government’s approach to “evidence-based decision-making”, and the Programme’s recognition of the importance of improving knowledge and skills and providing tools to support climate change adaptation.
- 6.15 Those who were less supportive described the policies as “vague”. This group of respondents repeatedly raised many of the issues outlined in Chapter 3 (Key issues). In particular, they asked for clarity about whom the policies and proposals were intended for; how the policies would be co-ordinated and delivered; and what the mechanisms would be for sharing learning with those who most needed it – including local authorities, the transport and energy industries, and the next generation of building trades professionals.

Perceived gaps and areas for development

- 6.16 Respondents noted a number of perceived gaps, or areas for development in the objectives under the B theme.

- 6.17 Under objective **B1** (understand the effects of climate change and their impacts on buildings and infrastructure networks):

- Transport-related policies: Respondents who commented on the transport-related policies under B1 voiced support for them. However, there were also concerns that the transport policies focussed predominantly on the roads infrastructure. There were repeated calls by respondents to incorporate policies aimed at supporting walking and cycling, and reducing reliance on cars. These could include: Regional and Local Transport Strategies and the Strategic Transport Projects Review (2009) which all promoted walking, cycling and the use of public transport.

There was support for proposal B1-17 (Tomorrow’s Railway and Climate Change Adaptation) and respondents wanted to see a greater focus on measures to address the risk of climate change on the rail infrastructure.

Gaps in the transport-related policies were perceived in relation to water transport infrastructure (e.g. harbours, ports, etc.) and airports.

- Built environment: Respondents made two main points in relation to policies B1-1 and B1-2 (research to identify necessary resilience measures for new / existing buildings). First, respondents noted that “existing buildings” appeared to be defined in policy B1-2 as “historic buildings”. Respondents wanted assurance that policies to improve the resilience of “existing buildings” would cover the whole range of building types, including housing, workplaces, care homes – as well as historic monuments and archaeological sites.

Second, respondents called for the Programme to clarify the mechanism(s) by which research findings / good practice would be communicated, promoted and enforced in the building sector. Costs of building repairs or upgrades were seen as a barrier to wide-spread adoption of adaptation measures. Therefore, respondents saw the need for stronger, enforceable policies in this area.

- Flood Risk Management Plans (FRMPs) and River Basin Management Plans (RBMPs): In relation to policies B1-12 and B1-13, respondents wanted more detail about how FRMPs and RBMPs would address climate change adaptation. Respondents wanted to see the Programme inform the development of FRMPs and RBMPs from 2014 onwards.

It was suggested that the Programme should include stronger, more specific measures to address the potential impacts of climate change on rivers, lochs and reservoirs – for example, in relation to nutrient loadings, algal blooms, water quality and quantity.

- Energy infrastructure: Respondents supported the proposal to develop an Energy Sector Climate Change Impacts research programme. However, they also wanted to see a wider range of policies and proposals to support a resilient energy sector. It was suggested that the Programme could include reference to:
 - The energy sector’s First Round Adaptation Reports (submitted to the UK government in 2011)
 - The summary report produced by the Association of Electricity Producers, “Climate change risks and adaptation responses for UK electricity generation” (Oct 2011).
 - The Energy Sector Action Plan.

6.18 Under **objective B2** (provide knowledge, skills and tools to manage climate change impacts), the following issues were raised by a range of respondents:

- Insufficient emphasis on skills and tools: It appeared to respondents that the focus of policies under objective B2 was mainly on providing knowledge, and less on providing skills and tools. It was suggested that the Programme should include a wider range of policies and proposals related to training schemes and tool kits to balance this section. Respondents noted the importance, in particular, of providing training to local authority planners, public sector estate managers, builders and members of the construction industry and developers (including those involved in telecommunications and energy sector developments).
- Sustainable Urban Drainage Systems (SUDS): It was suggested that local authorities needed additional guidance on how to design and manage SUDS and that the Programme could usefully refer to the existing guidance available from RSPB.
- Energy sector: Respondents welcomed the proposal to establish a Scottish Government Energy Sector Flood Risk work stream (proposal B2-24), but wanted the Programme to clarify that this would also include work on hydro, tidal and wind energy. Respondents queried why there was a policy on “liaising with the industry on thermal generation” (B2-7), but no specific policies related to these other forms of energy generation.
- Historic sites and older housing stock: There was a view that any focus on historic properties should emphasise “adaptive management” rather than “protection”. Respondents also emphasised that any learning acquired – for example, by Historic Scotland through the management of historic buildings –

should be disseminated to local authorities who also have responsibility for maintaining a wide range of older buildings.

- Relevance of certain policies to adaptation: Respondents asked for clarification about how policies B2-8 to B2-10 (on marine strategy and planning) would contribute to the adaptation of coastal infrastructure. It was suggested the Programme might highlight the importance for marine planning authorities to ensure that marine and coastal developments will be resilient to the risks of coastal change and flooding; and will not themselves contribute adversely to coastal change.

6.19 In relation to **objective B3** (increase the resilience of buildings and infrastructure networks to sustain and enhance the benefits and services provided), respondents' comments often echoed points they had previously made in relation to objectives B1 and B2. Additional areas for development or perceived gaps identified in the policies / proposals under B3 were in relation to:

- Adaptation of existing buildings: Respondents welcomed policies B3-1 to B3-3 and reiterated the importance of planning policy and building standards guidance in driving forward adaptive practices in the construction industry. However, there was concern that the Programme had not addressed the challenges of developing resilience in older buildings that may be difficult and expensive to improve, or where mixed ownership makes it difficult to undertake repairs and improvements.
- Green infrastructure: Respondents appreciated the mention of green infrastructure under the Scottish Planning Policy (B3-3). However, as noted previously, it was thought that the importance of green infrastructure was not adequately acknowledged in the Programme.
- Flood insurance: Respondents welcomed the inclusion of proposal B3-13 (work with the UK government and insurance industry to ensure the availability of flood insurance) and considered this to be a priority action. Respondents emphasised the importance of this issue not only for domestic properties, but also for businesses – and small businesses in particular, which may not be able to operate if they cannot afford flood insurance.

Extent to which the Programme addresses the impacts identified in the UK CCRA (Q3e)

6.20 Forty-one (41) respondents answered Question 3e. Of these, 29 (71%) thought the policies and proposals listed under the B objectives either “fully” or “mostly” addressed the impacts identified in the UK CCRA, while 12 (29%) thought it only “partially” or “poorly” did so. (Table 6.5.) The latter group included most non-government organisations (NGOs) and education / research organisations and four out of 18 local authority respondents.

Table 6.5: Question 3e – Taken together, do the policies and proposals listed under objectives, B1, B2 and B3 address the current and predicted impacts to Scotland’s buildings and infrastructure networks identified in the UK Climate Change Risk Assessment?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	1	1	3
Local authority & CPPs	2	12	4		18
NGOs		1	4		5
NHS or health-related		3	1		4
Private sector	3	1			4
Transport		2			2
Other public bodies		4			4
Individual respondents					0
Total	5	24	11	1	41
Total percentages	12%	59%	27%	2%	100%

6.21 Thirty-one (31) respondents made comments in relation to Question 3e. This represents 46% of all respondents to the consultation. In general, respondents who commented at Question 3e referred back to, or repeated, comments they had made in response to one or more of Questions 3a-3d. Others identified a range of additional risks which they thought were not addressed in the Programme. These included:

- Risks to the historic environment and cultural heritage from erosion
- Risks to alternative energy generation
- Risks to health from a changing climate, and how these would influence estates strategies in public sector (particularly NHS) organisations.

6.22 In addition, there was a general view that the Programme had comprehensively addressed the risks of flooding on infrastructure and the built environment. However, it was thought that other risks had not been adequately addressed. This include, among others:

- Overheating in buildings
- Higher energy demands for cooling
- Heat damage and disruption to energy infrastructure
- Changes in soil conditions and loss of water holding capacity in soils
- Sea level rise and related risks of tidal and storm surges.

7 CLIMATE READY SOCIETY

7.1 This chapter presents an analysis of respondents' views on the objectives, policies and proposals set out under the heading of a Climate Ready Society (S theme). The S theme included the following three objectives:

- S1 – Understand the effects of climate change and their impacts on people, homes and communities
- S2 – Increase the awareness of the impacts of climate change to enable people to adapt to future extreme weather events
- S3 – Support our health service and emergency responders to enable them to respond effectively to the increased pressures associated with a changing climate

7.2 The consultation asked five questions in relation to this theme:

Question 4a: Do objectives S1, S2 and S3 collectively set an appropriate long term direction to ensure that our communities are able to adapt to our changing climate?

Question 4b: To what extent will the policies and proposals listed under objective S1 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 4c: To what extent will the policies and proposals listed under objective S2 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 4d: To what extent will the policies and proposals listed under objective S3 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Question 4e: Taken together, do the policies and proposals listed under objectives S1, S2 and S3 address the current and predicted impacts to Scottish society identified in the UK Climate Change Risk Assessment?

7.3 This chapter includes three sub-sections: the first will discuss respondents' comments on Question 4a; the second will present views about the policies and proposals under each objective (Questions 4b-4d); and the third will consider the responses to Question 4e.

Do the objectives collectively set an appropriate long term direction? (Q4a)

7.4 Forty-three (43) respondents answered Question 4a. Of these, 28 (65%) thought the objectives either "fully" or "mostly" set an appropriate long term direction for adaptation within Scottish communities, while 15 (35%) thought they only "partially" or "poorly" did so. (Table 7.1.) The latter group included most of the education / research respondents and most of the non-governmental organisations (NGOs), as well as 5 out of 19 local authority respondents.

7.5 Thirty-six (36) respondents provided further comment in relation to Question 4a. This represents just over half (54%) of all respondents.

Table 7.1: Question 4a – Do objectives S1, S2 and S3 collectively set an appropriate long term direction to ensure that our communities are able to adapt to our changing climate?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research		1	3	1	5
Local authority & CPPs	3	11	5		19
NGOs		2	4		6
NHS or health-related		3	1		4
Private sector	1		1		2
Transport	1				1
Other public bodies		5			5
Individual respondents		1			1
Total	5	23	14	1	43
Total percentages	12%	53%	33%	2%	100%

General comments

- 7.6 Respondents who ticked “fully” or “mostly” in response to Question 4a generally described the objectives as “comprehensive”, and addressing “a good range of important issues”. This group of respondents thought that the objectives collectively “covered the most important aspects of community resilience”, “identified the risks clearly” and “successfully reflected the way most members of the public will experience the impact of climate change”.
- 7.7 Those who were less satisfied commented that the S theme was “the least developed” of the Programme’s three themes.
- 7.8 Across all questions (Questions 4a-e), respondents said that links needed to be made with the social inclusion and community regeneration agendas. They suggested that the provisions of the Community Empowerment Bill, in particular, provided an opportunity to integrate mechanisms for community capacity building into the Programme.
- 7.9 Once again, many of the issues identified in Chapter 3 (Key issues) were also raised in respondents’ comments on the S theme. In particular, respondents wanted further detail about responsibilities for implementation (particularly for public bodies) and funding. They also suggested there was a need to make links to the other two (N and B) themes in the Programme in relation to green infrastructure and improving building standards.

Perceived gaps and areas for development

- 7.10 In their responses to Question 4a, respondents highlighted specific areas in the S theme which they perceived as gaps, or as areas for development. Key concerns, across a wide range of respondents, included:
- **Business and the economy:** The lack of reference in any of the S objectives to improving the adaptive capacity of businesses and the economy was seen to be a significant omission. Some respondents thought that the Programme should have a separate theme on the economy, while others thought there should be a fourth objective on the economy under the S theme. However, it was also suggested that policies related to business and services could be

incorporated within the current S objectives, for example, by revising the S1 objective to include “people, homes, communities and businesses”.

Disruption to supply chains was thought to be a significant risk for businesses and services, and it was suggested that businesses dependent on the natural environment were at greatest risk from a changing climate.

- **Building capacity in communities:** While some respondents recognised the efforts of the Programme to include community capacity building measures, there was a general view that these were not sufficient. Respondents wanted to see a shift in emphasis within the S objectives from increasing awareness to building capacity (i.e. “unlocking the ability of individuals and communities to do things for themselves”). Respondents thought the Programme should acknowledge the role of the third sector and the education sector in engaging with communities and supporting capacity building.
- **Health services and emergency responders (objective S3):** Respondents from a range of sectors agreed that health and emergency services had a crucial role to play. However, they thought the objective should be expanded to recognise local authorities and community planning partners as emergency responders.
- **Interpretation of resilience:** There was a concern that resilience should not be equated with emergency planning. Rather, respondents argued that resilience is more about the long term process of achieving community-level preparedness, and therefore, communities also have a role in this.
- **Food security and food systems:** Respondents thought the Programme had not addressed the risks to Scottish society of increased prices and reduced supplies, particularly supplies of food for a healthy lifestyle. The adaptation requirements for domestic food production, including organic systems, should be included in the S theme. There was a view that food security problems would have the greatest impact on people who were socially disadvantaged.

Appropriateness of policies and proposals under each objective (Qs 4b-4d)

7.11 Questions 4b, 4c and 4d asked for respondents’ views on the policies and proposals set out under objectives S1, S2 and S3 respectively. Tables 7.2, 7.3 and 7.4 on the following page show that around half of the total 67 respondents answered each of these three questions:

- Of the 38 respondents who answered Question 4b, 24 (64%) thought that the policies and proposals under objective S1 were “fully” or “mostly” appropriate, while 14 (37%) thought they were less so.
- Of the 37 respondents who answered Question 4c, 27 (73%) thought that the policies and proposals under objective S2 were “fully” or “mostly” appropriate, while 10 (27%) thought they were less so.
- Of the 33 respondents who answered Question 4d, 23 (70%) thought the policies and proposals under objective S3 were “fully” or “mostly” appropriate, while 10 (30%) thought they were less so.

7.12 Across all three objectives, those who were less supportive included a majority of the education / research respondents and between one-fifth and two-fifths of the local authority respondents.

Table 7.2: Question 4b – To what extent will the policies and proposals listed under objective S1 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research		1	3	1	5
Local authority & CPPs	2	9	6	1	18
NGOs	1	3			4
NHS or health-related	1	2	1		4
Private sector		1		1	2
Transport			1		1
Other public bodies		4			4
Individual respondents					0
Total	4	20	11	3	38
Total percentages	11%	53%	29%	8%	100%

* Percentages do not total 100% due to rounding.

Table 7.3: Question 4c – To what extent will the policies and proposals listed under objective S2 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research		1	3	1	5
Local authority & CPPs	3	11	3	1	18
NGOs		3	1		4
NHS or health-related	1	3			4
Private sector	1		1		2
Transport		1			1
Other public bodies		3			3
Individual respondents					0
Total	5	22	8	2	37
Total percentages	14%	59%	22%	5%	100%

Table 7.4: Question 4d – To what extent will the policies and proposals listed under objective S3 provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research		1	3		4
Local authority & CPPs	2	10	5		17
NGOs		1	1		2
NHS or health-related		4			4
Private sector		1		1	2
Transport	1				1
Other public bodies		3			3
Individual respondents					0
Total	3	20	9	1	33
Total percentages	9%	61%	27%	3%	100%

7.13 The number of respondents who made further comments at Questions 4b, 4c and 4d, are shown below:

- 33 respondents (49% of the total 67) commented at Question 4b
- 34 respondents (51% of the total 67) commented at Question 4c
- 26 respondents (39% of the total 67) commented at Question 4d

General comments

7.14 Those who were generally satisfied with the appropriateness of the policies and proposals under objectives S1, S2 and S3 generally described them as “comprehensive”, “well-covered” and “well-articulated”.

7.15 Respondents considered the “climate justice work” under objective S1 to be especially welcome and valuable. Those who commented on policy S1 (Research to identify and develop an understanding of communities) were unanimous in their support of this work, and considered it appropriate that people who were most vulnerable to the potential effects of climate change should be prioritised in the Programme. There was a call for the Programme to consider how the findings of this work might inform adaptation responses within communities.

Perceived gaps and areas for development

7.16 Respondents noted a number of issues which they perceived to be missing from the policies and proposals under the S theme, or which they thought required further development. Issues that were noted by a range of respondents are reported here.

7.17 Under objective **S1** (understand the effects of climate change and their impacts on people, homes and communities):

- Range of measures inadequate: There was a general view that the policies under objective S1 seemed “quite thin compared to other objectives”, with a limited focus on food-borne pathogens and flood-prone communities. While there was recognition among some respondents that the first five years of the Programme would be spent in gathering information (thus the large volume of work in the proposals section of S1), others thought that there was scope to incorporate additional measures under S1. It was suggested that a review be undertaken by the Scottish Government of the policies and proposals under S1 to ensure that relevant action is being taken in the current Programme, using existing knowledge of the social impacts of severe weather.

Suggestions for additional work under S1 included research on, for example:

- The impact of climate change on communities
- How community-led activities can increase the social and environmental resilience of communities
- Why people do not engage with climate change messages
- Ways of improving skills and awareness among community planning partners
- The risks to businesses and the economy

7.18 Under objective **S2** (increase the awareness of the impacts of climate change to enable people to adapt to future extreme weather events), the following issues were raised by a range of respondents:

- **Educating and raising awareness:** In general, respondents agreed that there was a crucial need to raise awareness and educate those living and working in communities – particularly those who may be at risk from flooding. However, there was a view that the policies and proposals under S2 might fail to reach those who are most vulnerable, and it was suggested that additional efforts should identify ways of measuring community and individual preparedness. The point was also made that strategies would be needed to ensure that information is accessible to people in emergency situations when electronic communications may not be available.

Respondents welcomed policies S2-12 (increase awareness of flood risk and flood resilience in schools) and S2-14 (improve education on flood risk management), but also thought that a range of other agencies, including those in the third sector and local universities and colleges, could be involved in educating and raising awareness among members of the wider public in a range of informal settings.

Some respondents highlighted existing resources (in addition to those mentioned in the Programme) which they suggested the Programme could mention as supporting community awareness raising and education. These included:

- Scotland's Environment Web (which provides an education resource)
 - Eco Schools Scotland Programme (managed by Keep Scotland Beautiful)
 - Community Flood Resilience Groups (which actively promote the take up of SEPA's Flood Line)
 - Charretteplus programme (developed by Planning Aid for Scotland)
 - Adaptation Scotland (which provides support for businesses and provides a community training kit).
- **Resources to support capacity building:** As noted above, respondents emphasised the importance of capacity building measures within the Programme. Therefore, policy S2-7 (develop and promote resources to support capacity building and resilience to emergencies) was considered to be a key policy. However, respondents thought that the provision of information, guidance and advice would not be sufficient. Practical measures are also needed such as establishing "cool refuges" in public places; developing additional resources for poorer households; working with social landlords to flood-proof dwellings; and supporting community-level developments in relation to renewables, waste processing and food security.
 - **Wider effects of climate change for communities:** Respondents commented that the policies and proposals under objective S2 were largely focused on flooding. The point was made that there are also wider consequences of climate change, including impacts for health and wellbeing, which should be addressed in the Programme.

7.19 Under objective **S3** (support our health service and emergency responders to enable them to respond effectively to the increased pressures associated with a

changing climate), respondents welcomed the plans to improve capacity within health and emergency services. However, as mentioned in para 7.10 (point 3), they also thought that the policies and proposals under S3 should be broadened to consider longer term impacts and to reflect the contributions of other agencies, including:

- Local authorities and the voluntary sector in providing long-term care for vulnerable people
- Third sector organisations in providing specialist expertise
- Neighbourhood partnerships as emergency responders

7.20 This general view was echoed in the comments made by a range of respondents on policies S3-1 (development of individual Climate Change Adaptation Plans by NHS Boards) and S3-2 (development of Property and Asset Management Plans). All those who commented on these policies suggested these policies should apply to all public bodies and not just the NHS.

Extent to which the Programme addresses the risks identified in the UK CCRA (Q4e)

7.21 Thirty-seven (37) respondents answered Question 4e. Of these, 24 (65%) thought that the policies and proposals listed under the S objectives either “fully” or “mostly” addressed the predicted current and future impacts to Scottish society identified in the UK CCRA, while 13 respondents (35%) thought they only “partially” or “poorly” did so. (Table 7.5.) The latter group included most of the education / research organisations and 4 out of 17 local authority respondents.

Table 7.5: Question 4e – Taken together, do the policies and proposals listed under objectives S1, S2 and S3 address the current and predicted impacts to Scottish society identified in the UK Climate Change Risk Assessment?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning					0
Education & research		1	3	1	5
Local authority & CPPs	3	10	4		17
NGOs		2	3		5
NHS or health-related		3	1		4
Private sector	1			1	2
Transport	1				1
Other public bodies		3			3
Individual respondents					0
Total	5	19	11	2	37
Total percentages	14%	51%	30%	5%	100%

7.22 Twenty-nine (29) respondents made comments in relation to Question 4e. Some simply referred back to or repeated comments they had previously made in response to Questions 4a-4d.

7.23 Others identified a very wide range of risks which they thought were not adequately addressed in the Programme, including:

- Risks to water and air quality
- Risks to communities and businesses from wildfire, rising sea levels and coastal erosion
- Business and service disruption and increased commodity costs
- Financial risk (including increased insurance costs) for vulnerable groups
- Risks to outdoor leisure, sport, tourism and major outdoor events
- Increased immigration
- Risks to food production and supply chains
- Heat- and cold-related mortality and disruption

7.24 However, it was not generally clear from the responses whether these were related to risks identified in the UK CCRA.

8 ROLE OF OTHERS IN DELIVERING THE PROGRAMME

- 8.1 This chapter presents an analysis of respondents' views on the role of public bodies and other organisations / groups in delivering the Programme. The consultation document included two questions on this issue:

Question 5a: What support will public bodies require in meeting their duties to help deliver the programme?

Question 5b: Are the arrangements for ensuring public engagement and for involving employers, trade unions and other stakeholders in meeting the programme objectives sufficient?

- 8.2 Respondents' comments in relation to Question 5a focused on many of the issues outlined in Chapter 3 (Key points). This chapter will provide a more detailed analysis of these comments.

Support required by public bodies to help deliver the Programme (Q5a)

- 8.3 Forty-nine (49) respondents (73% of all respondents) offered comments in response to Question 5a. Table 8.1 below shows a breakdown of respondents, by respondent type. The table shows that local authorities, NHS organisations and other public bodies comprised nearly two-thirds of the respondents to Question 5a.

Table 8.1: Question 5a – What support will public bodies require in meeting their duties to help deliver the Programme?

Respondent Type	Total
Conservation & planning	3
Education & research	5
Local authority & CPPs	21
NGOs	6
NHS or health-related	4
Other public bodies	5
Private sector	2
Transport	2
Individual respondents	1
Total	49

General comments

- 8.4 Respondents welcomed the Scottish Government's efforts to produce a national adaptation programme. It was acknowledged that climate change would affect the way services are delivered in the future as public bodies throughout Scotland sought to respond to the increasing frequency of severe weather events.
- 8.5 Respondents made a range of specific suggestions for the type of support, guidance and extra resources that public bodies would need to meet their duties in helping to deliver the Programme. (These will be discussed below.) In addition, they also made more general comments about the Programme and asked for certain issues to be clarified. These more general comments were made by **all** public sector bodies, as well as some non-governmental

organisations (NGOs) not only at Question 5a, but repeatedly in their responses to the consultation. General comments focused on the need for clarity about:

- **Roles and responsibilities:** Public sector bodies were unsure about what, if any, aspects of the Programme they were expected to deliver. There was a unanimous call for clarification on this point. This group of respondents wanted guidance about what specific actions were required to be delivered, by whom, in what timescales and what resources would be needed. Although the Programme stated that the role of local authorities, in particular, was “critical” to the success of adaptation in Scotland, it was pointed out that very few of the policies and proposals had identified local authorities as a delivery body.
- **Reporting requirements:** Respondents also sought guidance about monitoring and reporting requirements, how compliance with the public bodies duty would be measured, and what the implications would be for the community planning process and Single Outcome Agreements. It was noted that local authorities already produce annual Sustainability Reports and Climate Change Declaration Statements, and there was a question about whether reporting for the Programme would be through these existing mechanisms, or some form of additional reporting.
- **The resources available for delivery:** Respondents thought that additional resources would be required to deliver the Programme, particularly in the context of wider austerity measures. They wanted the Programme to make explicit the funding that is already committed for the policies and proposals. This was of particular concern to local authority respondents, who thought it would be difficult to secure high-level support for implementation within their own organisations without adequate financial and staff resources.

Specific suggestions about the support public bodies would require

8.6 A range of respondents made specific suggestions for the support that will be needed by public bodies to help deliver the Programme. These included:

- **Guidance, tools and training:** Respondents highlighted a need to build capacity and skills within the public sector. Guidance, mentoring, training and learning materials based on high quality research and best practice would be needed. Case studies were seen to be particularly useful to aid understanding.

Respondents also saw a need for tools and, in some cases, technical assistance to help in the identification of priorities and to assist decision-making at a local level. Support was voiced for continued or enhanced funding for organisations like Adaptation Scotland and Sustainable Scotland Network which have played an important role in capacity building, sharing knowledge, and producing guidance. The further and higher education sector and bodies like ClimateXChange were also seen to provide a role in disseminating research findings to public bodies.
- **Leadership:** Respondents mentioned the need for leadership or champions at a senior level in national and local government to ensure that the Programme receives adequate priority and resources.
- **Financial models:** Respondents highlighted a need for the development of long term financial models to help public body finance managers understand the long term payback for early investment in adaptation activities.

- Strengthened planning policy: It was suggested there is a need for stronger measures to support adaptation through planning policy.

Arrangements for public engagement (Q5b)

- 8.7 Question 5a focused on the role of public bodies in helping to deliver the Programme. Question 5b focused on respondents' views about whether sufficient arrangements had been set out in the Programme for engaging a wide range of **other** organisations / groups to help with delivery.
- 8.8 Thirty-six (36) respondents answered Question 5b. Of these, 15 (42%) thought that the arrangements were sufficient for ensuring public engagement and involving others in meeting the Programme objectives, and 21 (58%) thought they were not. (Table 8.1.) Local authorities and NHS organisations were divided in their views on this question, while non-governmental organisations (NGOs) unanimously thought the arrangements set out in the Programme were not sufficient.

Table 8.1: Question 5b – Are the arrangements for ensuring public engagement and for involving employers, trade unions and other stakeholders in meeting the Programme objectives sufficient?

Respondent Type	Yes	No	Total
Conservation & planning		2	2
Education & research	1	2	3
Local authority & CPPs	8	8	16
NGOs		6	6
NHS or health-related	2	2	4
Private sector	1		1
Transport	1	1	2
Other public bodies	2		2
Individual respondents			0
Total	15	21	36
Total percentages	42%	58%	100%

- 8.9 Forty (40) respondents (60% of all respondents) made comments in relation to Question 5b.
- 8.10 Those who thought arrangements were sufficient described the proposals as “sound”, “appropriate” and a “sufficient starting point”. However, these same respondents highlighted areas for development, similar to those who did not think the arrangements were adequate.
- 8.11 In summary, respondents commented that they felt that there should be more engagement work with businesses, communities, the media and the general public. Respondents wanted to see a “clear statement of ambition” to engage more inclusively with all relevant stakeholders. In addition, as highlighted in Chapter 7, respondents particularly emphasised the need to engage more effectively with communities on the issue of climate change. Another key issue was the perceived lack of clarity on the delivery of engagement activities – roles, responsibilities, timescales and resourcing.

Other comments

8.12 In relation to the need to engage a wider group of stakeholders, respondents emphasised the importance of:

- **Building capacity and skills:** Respondents highlighted a need for training not just among public bodies, but among all relevant stakeholders. There was a concern that the Scottish Government and other responsible organisations may not have the skills in adaptation, and in community engagement, to successfully deliver the Programme. At the same time, as noted above, there was support for Adaptation Scotland's role in providing training, tools, resources and practical support across the public, private and third sectors. However, concern was raised that there were not the resources necessary to support its continued delivery.
- **Community planning:** This was seen to be central to being able to build resilience and adaptation measures and respondents wanted this point to feature more in the finalised version of the Programme. Respondents pointed out that Community Planning Partnerships involve stakeholders from all sectors, and these bodies have a key role in co-ordinating and delivering local policy frameworks to support community resilience.

9 STRATEGIC ENVIRONMENTAL ASSESSMENT REPORT

- 9.1 This chapter presents an analysis of respondents' views on the Strategic Environmental Assessment (SEA) Report. This was included in the consultation as a separate document.
- 9.2 The Scottish Government carried out an SEA of the Programme, as required by the Environmental Assessment (Scotland) Act 2005. The purpose of the SEA was to ensure that environmental considerations were incorporated into the development of the Programme. An SEA is a systematic process which sets out the key environmental issues arising from the Programme in an Environmental Report. The consultation asked six questions about the Environmental Report:

Question 6a: To what extent does the Environmental Report set out an accurate description of the current environmental baseline?

Question 6b: Do you agree with the predicted environmental effects of the draft adaptation programme, set out in the Environmental Report?

Question 6c: Do you agree with the recommendations set out in the Environmental Report?

Question 6d: Do you agree with the proposals for monitoring of the environmental effects of the draft programme set out in the Environmental Report?

Question 6e: Are you aware of any further environmental information that will help to inform the environmental assessment findings?

Question 6f: Are you aware of other 'reasonable' alternatives to the adaptation programme and its content that should be considered as part of the SEA process?

Description of the current environmental baseline (Q6a)

- 9.3 Twenty-nine (29) respondents answered Question 6a. Of these, 17 (59%) thought that the SEA either "fully" or "mostly" set out an accurate description of the current environmental baseline, while 12 (41%) thought that it only "partially" or "poorly" did so. (Table 9.1.) The latter group included 4 out of 14 local authority respondents, 2 of the 3 education / research respondents and 2 of the 3 non-governmental organisations (NGOs).

Table 9.1: Question 6a – To what extent does the environmental report set out an accurate description of the current environmental baseline?

Respondent Type	Fully	Mostly	Partially	Poorly	Total
Conservation & planning			1		1
Education & research		1	1	1	3
Local authority & CPPs	2	8	4		14
NGOs		1		2	3
NHS or health-related		2	2		4
Other public bodies		1			1
Private sector		1			1
Transport		1			1
Individual respondents			1		1
Total	2	15	9	3	29
Total percentages	7%	52%	31%	10%	100%

9.4 Twenty-one (21) respondents (31% of all respondents) provided comments at Question 6a. Those who had ticked “fully” or “mostly” in response to Question 6a thought that the SEA had set a “wide reaching” and “accurate” environmental baseline and had done so in a “succinct” and “clear” manner. It was also described as “appropriate for the level of assessment”. However, those who ticked “partially” or “poorly” in response to Question 6a thought that:

- A more comprehensive baseline assessment was needed. However, respondents thought the policies and proposals in the Programme should be more clearly defined to enable progress to be measured. Respondents thought it would be useful if data were provided on the number of adaptation measures already in place.
- The current description of the baseline contained “subjective statements”.
- The SEA had been conducted at a high level, and as a result much detail and many environmental impacts were likely to have been missed or poorly described.

9.5 Those who had ticked “mostly” went on to make suggestions for additions or improvements to the SEA, including for example:

- Taking into account more recent reports from the Intergovernmental Panel on Climate Change (IPCC) which indicate that the effects of climate change are taking place more rapidly than current models suggest
- The baseline should refer to current issues in the marine environment, and include marine resources as material assets
- Incorporating appropriate datasets to provide an accurate baseline in relation to green space (e.g. Scotland’s Greenspace Map; Scottish Household Survey; Central Scotland Green Network (CSGN) priorities).

Predicted environmental effects of the Programme (Q6b)

9.6 Twenty-seven (27) respondents answered Question 6b. Of these, 19 (70%) said they agreed with the predicted environmental effects of the Programme as set out in the SEA and 8 (30%) said they did not. (Table 9.2.)

Table 9.2: Question 6b – Do you agree with the predicted environmental effects of the draft adaptation Programme, set out in the Environmental Report?

Respondent Type	Yes	No	Total
Conservation & planning			0
Education & research	2	1	3
Local authority & CPPs	10	4	14
NGOs	1	2	3
NHS or health-related	3	1	4
Other public bodies	1		1
Private sector	1		1
Transport	1		1
Individual respondents			0
Total	19	8	27
Total percentages	70%	30%	100%

- 9.7 Twenty (20) respondents (30% of all respondents) made comments at Question 6b. Some respondents described the predicted environmental effects set out in the SEA as “acceptable”, “sensible” and “robust”. Others expressed the view that, because the Programme was “vague” and “lacked detail”, this made it difficult to assess whether the Programme would address the predicted environmental effects set out in the SEA. In addition, while it was thought that the policies set out in the Programme would have a beneficial effect for the environment, at the same time it was thought that the SEA over-stated the benefit of the Programme itself, since many of the policies included in the Programme were already in existence and being implemented.
- 9.8 Respondents made a range of other comments about the predicted environmental effects of the Programme, including for example, that:
- The potential negative impacts of the Programme were thought to be downplayed, and the potential for “unpredicted” or unintended effects were not acknowledged
 - The challenge of implementation and the issue of funding were not addressed.

Recommendations in the Environmental Report (Q6c)

- 9.9 Twenty-five (25) respondents answered Question 6c. Of these 22 (88%) agreed with the recommendations set out in the SEA and 3 (12%) disagreed. (Table 9.3.)

Table 9.3: Question 6c – Do you agree with the recommendations set out in the Environmental Report?

Respondent Type	Yes	No	Total
Conservation & planning			0
Education & research	2	1	3
Local authority & CPPs	10	2	12
NGOs	3		3
NHS or health-related	4		4
Other public bodies	1		1
Private sector	1		1
Transport	1		1
Individual respondents			0
Total	22	3	25
Total percentages	88%	12%	100%

- 9.10 Twenty-one (21) respondents (31% of all respondents) made comments at Question 6c. In general, even where respondents indicated their agreement with the recommendations (by ticking “Yes”), they also made suggestions for improvements. For example, support was expressed for the recommendations made in relation to soil conservation, water quality and the resilience of the energy and food supply sectors. However, respondents wanted to see specific measures identified in the current Programme in relation to these issues so that appropriate action could be taken within the next Programme.
- 9.11 Respondents thought the recommendations would be strengthened by making them more specific and incorporating proposals / actions for taking them forward. They also wanted to see additional recommendations that would address:
- Rising sea levels and coastal erosion

- Water quality and quantity
- Shorter-term (as well as longer-term) impacts on landscapes and communities
- Future-proofing of climate mitigation strategies
- Future-proofing of critical infrastructure.

Proposals for monitoring the environmental effects of the Programme (Q6d)

9.12 Twenty-five (25) respondents answered Question 6d. Of these, 19 (76%) said that they agreed with the proposals for monitoring the environmental effects of the Programme and 6 (24%) said they did not. (Table 9.4.)

Table 9.4: Question 6d – Do you agree with the proposals for monitoring of the environmental effects of the draft programme set out in the Environmental Report?

Respondent Type	Yes	No	Total
Conservation & planning			0
Education & research	2	1	3
Local authority & CPPs	9	3	12
NGOs	1	2	3
NHS or health-related	4		4
Other public bodies	1		1
Private sector	1		1
Transport	1		1
Individual respondents			0
Total	19	6	25
Total percentages	76%	24%	100%

9.13 Eighteen (18) respondents (27% of all respondents) provided additional comments at Question 6d. Respondents welcomed the plans to monitor the effects of the Programme and agreed that monitoring for the SEA should be an integral part of the monitoring for the Programme. It was suggested that the monitoring of the SEA and the Programme may be further integrated with the monitoring of related plans, programmes and strategies and their associated SEAs as this would minimise duplication of effort.

9.14 In relation to monitoring, respondents also commented that:

- Current monitoring networks are a legacy of past initiatives or regulatory requirements and are not necessarily fit to measure the effects of present and future climate change. It was suggested that an additional policy on environmental monitoring could be added to the Programme, with a comprehensive plan to monitor environmental change.
- Arrangements for monitoring lack sufficient detail (e.g. identification of lead authorities, timescales, funding and co-ordination).
- The indicators used to measure the impacts and progress of the Programme should monitor both potential positive and negative environmental effects.
- As noted previously in Chapter 5, monitoring undertaken through voluntary citizen science initiatives should be encouraged, but should not be considered a substitute for professional monitoring.

Additional information to help inform the environmental assessment findings (Q6e)

9.15 Twenty-five (25) respondents answered Question 6e. Of these 19 (76%) indicated that they were not aware of any further environmental information that would help inform the environmental assessment findings, and 6 (24%) said they were aware of additional information. (Table 9.5.)

Table 9.5: Question 6e – Are you aware of any further environmental information that will help to inform the environmental assessment findings?

Respondent Type	No	Yes	Total
Conservation & planning			0
Education & research	2		2
Local authority & CPPs	9	3	12
NGOs		3	3
NHS or health-related	4		4
Other public bodies	2		2
Private sector	1		1
Transport	1		1
Individual respondents			0
Total	19	6	25
Total percentages	76%	24%	100%

9.16 Eleven respondents (16% of all respondents) made further comments in response to Question 6e. Some of those who responded “No” to Question 6e nevertheless made suggestions – along with those respondents who said “Yes” – about additional information that would help inform the SEA findings. The following sources of additional information were identified:

- Living with Environmental Change (LWEC) – in particular, the report cards on terrestrial biodiversity and water
- Adaptation Scotland (described as “a useful source of collated environmental information”) and the adaptation tool hosted on Scotland’s Environment Web (SEweb) portal
- Scotland’s Greenspace Map; Scottish Household Survey; Central Scotland Green Network (CSGN) priorities; and Glasgow and Clyde Valley Green Network Opportunities Mapping (in relation to green space, as noted above in paragraph 9.5 above)
- Economics of Climate Resilience (ECR) project (which would provide a more detailed consideration of the environmental impacts of climate change)
- Marine information (annual report card published by the Marine Climate Change Impacts Partnership)
- Report by the Adaptation Sub-committee (in England) on “Managing the land in a changing climate – progress report 2013” – this is focus on England, but nevertheless provides recommendations that are useful to Scotland
- Findings from academic research – and it was suggested that government funding to universities or other research bodies for climate change research should be contingent upon the findings of that research being shared with public bodies.

Alternatives to the Programme (Q6f)

9.17 Twenty-seven (27) respondents answered Question 6f. Of these, 23 (85%) said they were not aware of other ‘reasonable’ alternatives to the Programme. Four respondents (15%) said they were aware of alternatives. (Table 9.6.)

Table 9.6: Question 6f – Are you aware of other ‘reasonable’ alternatives to the adaptation programme and its content that should be considered as part of the SEA process?

Respondent Type	No	Yes	Total
Conservation & planning		1	1
Education & research	2	1	3
Local authority & CPPs	12	1	13
NGOs	3		3
NHS or health-related	4		4
Other public bodies	1		1
Private sector		1	1
Transport	1		1
Individual respondents			0
Total	23	4	27
Total percentages	85%	15%	100%

9.18 Nine (9) respondents provided further comment in relation to Question 6f. This represents 13% of all 67 respondents.

9.19 None of the respondents proposed alternatives to the Programme. However, suggestions were made in relation to additions to its structure and / or content, including for example:

- Considering the potential benefits of a sectoral approach using the five themes of the UK CCRA Evidence Report. This was seen to provide a more practical basis for setting focused objectives and also more consistent with previous publications including the UK CCRA.
- Giving higher priority in the Programme to historic environment assets and cultural landscapes. While it appeared that the risks to these things had been identified in the SEA, it was not clear that they were adequately addressed in the Programme itself.
- Identifying climate analogues (i.e. using existing data to visualise what Scotland’s climate might be like in the future and comparing this to climates experienced in other parts of the UK today).
- Using “foresight or scenario exercises” in relation to specific topic areas. For example, it was suggested the Defra website gave useful examples in relation to food security that could potentially be replicated in other areas.

10 OTHER COMMENTS

10.1 This chapter briefly summarises comments made at Question 7, the last question in the consultation. It also summarises any other comments that respondents made in relation to the Programme which did not relate to any of the previous questions and it includes comments on the consultation process itself. The consultation asked:

Question 7: Please provide any additional comments you would like to make on the draft Scottish Climate Change Adaptation Programme.

10.2 Forty (40) respondents (60% of all respondents) made additional comments in relation to the Programme. These largely repeated or reiterated comments made in response to previous questions; highlighted areas for greater emphasis (e.g. business resilience; peatland conservation; coastal erosion; green infrastructure; etc.); and covered many of the issues already summarised in Chapter 3 (Key issues). Thus, these points are not repeated here.

10.3 Some respondents made positive comments about the Programme overall, describing it as “comprehensive” and “welcome”, and recognising the effort taken by the Scottish Government in developing a “strategic approach” to adaptation and setting a “long-term direction”. Respondents also voiced their willingness to play a part in helping Scotland to become more resilient to the processes of climate change.

10.4 Respondents also made broad statements about climate change in general, or adaptation in particular. For example:

- It is important that adaptation becomes embedded in the policy, processes and language of the planning system.
- Partnership working is key to the success of the Programme.
- The Scottish Government should avoid “perverse outcomes” whereby Scotland becomes more resilient to climate change while increasing emissions.
- Adaptation should include a strong element of behavioural change. There is a need to develop practical ways of helping people to integrate adaptation into their thinking and daily lives.
- Climate change is relatively new to public bodies, and the knowledge base is developing rapidly. Therefore, the Scottish Government should continue to support mechanisms for sharing knowledge and building capacity.

10.5 A wide range of general comments were also made about the Programme itself, including, for example:

- The Programme should be allowed to evolve as further changes in climate and associated risks develop.
- The Programme’s objectives should be more clearly aligned to the 15 National Outcomes in order to facilitate a stronger link between adaptation, Single Outcome Agreements and the Community Planning process.
- It would be helpful to clarify how the previous Adaptation Framework’s detailed 12 Sector Action Plans and their outcomes will be integrated into the current Programme.

- The Programme should mention the economic opportunities for businesses of adapting to climate change.

Disagreeing with the premise of the consultation

10.6 One (1) respondent challenged the premise upon which the Programme is based. This individual had the view that there is no evidence that climate change (or “global warming”) is taking place, and therefore argued that the Programme should be opposed.

Comments on the consultation process

10.7 In relation to the consultation process itself, the main comment was that respondents found it difficult to respond to this particular consultation because of the need to cross reference between multiple documents.

ANNEX 1: LIST OF ORGANISATIONAL RESPONDENTS

Conservation & planning (4)

- Archaeology Scotland
- Historic Scotland
- Planning Aid for Scotland
- Royal Town Planning Institute Scotland

Education and research (7)

- Education Scotland
- Joseph Rowntree Foundation
- The Environmental Association for Universities and Colleges (EAUC-Scotland)
- The James Hutton Institute
- UKCIP and Adaptation and Resilience in the Context of Change (ARCC) – Joint response
- UN Decade of Education for Sustainable Development – Community Learning and Development working group
- University of the Highlands and Islands

Local authority and community planning partnerships (22)

- Aberdeen City Council
- Aberdeenshire Council
- Angus Council
- City of Edinburgh Council
- Clackmannanshire Council
- Comhairle nan Eilean Siar
- Convention of Scottish Local Authorities (COSLA)
- Dumfries And Galloway Council
- Dundee City Council
- East Ayrshire Council
- Fife Council
- Glasgow City Council – Council officers' response
- Highland Council
- North Lanarkshire Council
- Orkney Islands Council
- Perth & Kinross Council
- Renfrewshire Community Planning Partnership – Greener Renfrewshire Board
- Renfrewshire Council
- Scottish Borders Council
- Stirling Council
- West Dunbartonshire Council
- West Lothian Council

NHS or health-related (5)

- Health Facilities Scotland (on behalf of NHSScotland Boards)
- NHS Greater Glasgow & Clyde
- NHS National Services Scotland
- NHS Tayside
- Scottish (Managed) Sustainable Health Network (SMaSH)

Non-government organisations (12)

- Changeworks Resources for Life Ltd.

- Greenspace Scotland
- Nourish Scotland
- Oxfam Scotland
- RSPB Scotland
- Scottish Allotments and Gardens Society
- Scottish Communities Climate Action Network
- Scottish Environment LINK
- Scottish Flood Forum
- Soil Association Scotland
- Stop Climate Chaos Scotland
- Sustainable Scotland Network

Private sector (4)

- EDF Energy
- Energy UK
- Jacobs U.K. Limited
- Scottish Salmon Producers' Organisation

Transport (4)

- Network Rail Infrastructure Limited
- Society of Chief Officers of Transportation in Scotland
- Strathclyde Partnership for Transport
- Transform Scotland

Other public bodies (6)

- Police Service of Scotland
- Quality Meat Scotland
- Scottish Enterprise
- Scottish Environment Protection Agency (SEPA)
- Scottish Natural Heritage
- Scottish Water

ANNEX 2: QUESTION RESPONSE RATES

Question number	Number of responses received	Response rate (of total 67 responses)
Views on the Overarching Framework		
1a -Closed	54	81%
1a-Open	57	85%
1b-Closed	49	73%
1b-Open	43	64%
Views on the Natural Environment theme		
2a-Closed	44	66%
2a-Open	41	61%
2b-Closed	45	67%
2b-Open	41	61%
2c-Closed	44	66%
2c-Open	43	64%
2d-Closed	38	57%
2d-Open	29	43%
2e-Closed	42	63%
2e-Open	36	54%
Views on the Infrastructure and Built Environment theme		
3a-Closed	44	66%
3a-Open	41	61%
3b-Closed	41	61%
3b-Open	39	58%
3c-Closed	42	63%
3c-Open	42	63%
3d-Closed	41	61%
3d-Open	41	61%
3e-Closed	42	63%
3e-Open	31	46%
Views on the Society theme		
4a-Closed	43	64%
4a-Open	36	54%
4b-Closed	38	57%
4b-Open	33	49%
4c-Closed	37	55%
4c-Open	34	51%
4d-Closed	33	49%
4d-Open	26	39%
4e-Closed	37	55%
4e-Open	29	43%
Views on the Role of Others in Delivering the Programme		
5a-Open	49	73%
5b-Closed	36	54%
5b-Open	40	60%

Question number	Number of responses	Response rate (out of total 67 responses)
Views on the Environmental Report		
6a-Closed	29	43%
6a-Open	21	31%
6b-Closed	27	40%
6b-Open	20	30%
6c-Closed	25	37%
6c-Open	21	31%
6d-Closed	25	37%
6d-Open	18	27%
6e-Closed	25	37%
6e-Open	11	16%
6f-Closed	27	40%
6f-Open	9	13%
Additional Comments		
7-Open	40	60%

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